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EXHIBIT A

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

UNITED STATES OF AMERICA,)	No. CR 13-00016 RMW
)	
Plaintiff,)	STIPULATION AND [
)	ORDER TO CONTINUE JULY 1, 2013,
vs.)	MOTIONS HEARING DATE TO JULY 29,
)	2013 AND EXCLUDE TIME UNDER
LUIS RICARDO PULIDO,)	SPEEDY TRIAL ACT
)	
Defendants.)	
_____)	Honorable Ronald M. Whyte

STIPULATION

Defendant Luis Richardo Pulido, and the government, acting through their respective counsel, hereby stipulate, subject to the Court's approval, that the Court continue the July 1, 2013 defense motions hearing date to July 29, 2013 at 9:00 a.m.

The parties request the motion hearing date be continued to permit the government additional time to receive and provide further discovery to the defense that consists of the audio tape recordings from the defendant's prior deportation hearings. The parties agree that the additional discovery is relevant to the motions hearing date presently set in this matter, and a continuance is necessary to permit the parties to obtain and review the additional discovery.

At the previous status hearing on June 3, 2013, the Court excluded time until July 1, 2013, for purposes of Speedy Trial Act computations pursuant to Title 18, United States Code, Section 3161(h)(7)(B)(iv).

The parties further agree and stipulate that time should be excluded from July 1, 2013 through and including July 29, 2013, to permit both parties additional time necessary time to effectively prepare, for purposes of Speedy Trial Act computations pursuant to Title 18, United States Code Section 3161(h). Accordingly, the defendant and the government agree that granting the requested exclusion of time will serve the interest of justice and outweigh the interest of the public and the defendant in a speedy trial.

Dated: June 18, 2013

_____/S/_____
VARELL L. FULLER
Assistant Federal Public Defender

Dated: June 18, 2013

_____/S/_____
MEREDITH EDWARDS
Special Assistant United States Attorney

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□ ORDER

Good cause appearing and by stipulation of the parties, IT IS HEREBY ORDERED that the motions hearing scheduled for July 1, 2013 at 9:00 a.m. is continued to July 29, 2013, at 9:00 a.m. It is further ordered that the period of delay from July 1, 2013, through and including July 29, 2013, is excluded for purposes of Speedy Trial Act computations pursuant to Title 18, United States Code, Section 3161(h)(7)(B)(iv), based on both parties' need to effectively prepare.

Dated: June G, 2013



HONORABLE RONALD M. WHYTE
United States District Judge